

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
Dallas Division**

CHARLENE CARTER,  Plaintiff,  v.  SOUTHWEST AIRLINES CO., AND TRANSPORT WORKERS UNION OF AMERICA, LOCAL 556,  Defendants.	Civil Case No. 3:17-cv-02278-X  <b>NOTICE REGARDING COMPLIANCE WITH THE COURT’S INSTRUCTIONS FOR FILING DEPOSITION DESIGNATIONS FOR BRETT NEVAREZ</b>
---	---

Plaintiff Charlene Carter (“Carter”), by and through her undersigned attorneys, hereby gives notice to the Court of her compliance with the Court’s request at the June 16, 2022 pretrial conference to file deposition designations for witness Brett Nevarez, who is unavailable for trial.<sup>1</sup>

Carter further states that she received a copy of Nevarez’s deposition transcript on Saturday, July 9, 2022 at 1:31 p.m. CT. Pursuant to the Court’s May 24, 2022 Amended Order, Carter has attached Brett Nevarez’s full deposition transcript to this notice.<sup>2</sup>

Dated: July 10, 2022

Respectfully submitted,

s/ Matthew B. Gilliam  
Mathew B. Gilliam (*admitted pro hac vice*)  
New York Bar No. 5005996  
*mbg@nrtw.org*  
c/o National Right to Work Legal Defense  
Foundation, Inc.  
8001 Braddock Road, Suite 600  
Springfield, Virginia 22160  
Tel: 703-321-8510

---

<sup>1</sup> Transcript of June 16, 2022 Pretrial Conference, Tr.164:19-165:18.

<sup>2</sup> Dkt. No. 236, p.3 ¶b.

Fax: 703-321-9319

Bobby G. Pryor  
State Bar No. 16373720  
bpryor@pryorandbruce.com  
Matthew D. Hill, Of Counsel  
State Bar No. 24032296  
mhill@pryorandbruce.com  
PRYOR & BRUCE  
302 N. San Jacinto  
Rockwall, TX 75087  
Telephone: (972) 771-3933  
Facsimile: (972) 771-8343

*Attorneys for Plaintiff Charlene Carter*

**Certificate of Service**

I hereby certify that on July 10, 2022, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

s/ Matthew B. Gilliam